

# Memorandum



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DATE : September 8, 1978  
TO : Alfredo A. Mandapat  
FROM : Pete Henault (Sgd.) Pete Henault  
SUBJECT : Temporary Storage Facility for PCB articles and containers

On August 18, Bill Riley of this office inspected the PCB temporary storage facility at the South Service Center. The purpose of the inspection was to determine what might be done to bring the storage shed into compliance with EPA's criteria for temporary storage of PCB's. Verbal recommendations were made at that time and have since been requested in writing.

There are five basic criteria set forth in 40 CFR 761.72 (b), which a temporary storage facility must meet to permit PCB storage for longer than 30 days:

- (1) Adequate roof and walls to keep out rain.
- (2) Adequate floor with a continuous curbing a minimum of six inches high, providing a containment volume equal to at least two times the internal volume of the largest PCB article or 25% of the total internal volume of all PCB equipment or containers stored therein, whichever is greater.
- (3) No drains.
- (4) Floors and curbing constructed of impervious material.
- (5) Facility shall not be located below the 100 year flood water elevation.

The storage facility, as it now stands, does not comply with the 2nd and 4th criteria and must be altered accordingly. The simplest and most cost-effective alteration would probably be to lay a cement floor with 2-3' high walls. Also, the building should be clearly marked according to the format shown in 40 CFR 761.44 (a), Figure 1.

Please contact Bill Riley of this office at x3568 if you have any questions or need further assistance.

WMR:ag

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